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12                    **UNITED STATES DISTRICT COURT**  
13                    **DISTRICT OF NEVADA**

14     Alexander Ferrari,  
15                    Plaintiff,  
16     v.  
17                    Defendants.  
18     Equifax Information Services, LLC;  
19                    and Bank of America, N.A.

20                    Case No.: 2:23-cv-00453-APG-NJK  
21                    **Discovery Plan and Scheduling**  
22                    **Order Submitted in Compliance**  
23                    **with LR 26-1(b)**

24     On May 10, 2023 defendant Bank of America, N.A., appeared in this case. On  
25     May 18, 2023 defendant Equifax Information Services, LLC appeared in this case.  
26     On June 6, 2023 Plaintiff filed his Notice of Settlement with Equifax Information  
27     Services, LLC. ECF No. 17.

28     The Court set a deadline to file a proposed discovery plan and scheduling  
29     order by June 24, 2023. Counsel for Alexander Ferrari and Bank of America, N.A.;  
30     (collectively as the “Parties”) met and conferred as required under Rule 30(b)(6) on  
31     32

1 June 13, 2023. The parties, by and through their respective counsel, hereby submit  
2 this Joint Discovery Plan and Scheduling Order. The parties will require 180 days  
3 of discovery measured from the date that Bank of America, N.A. filed its answer to  
4 Plaintiff's complaint.  
5

6 **DISCOVERY PLAN**

7 The parties propose the following discovery plan and scheduling order:  
8

9 1. Initial disclosures ..... June 27, 2023  
10 2. Amend pleadings and add parties .. July 13, 2023  
11 3. Expert disclosures (initial): ..... August 14, 2023  
12 4. Expert disclosures (rebuttal): ..... September 13, 2023  
13 5. Discovery cutoff date: ..... November 6, 2023  
14 6. Dispositive motions: ..... December 6, 2023  
15 7. Pretrial order ..... January 5, 2024

16 In the event that dispositive motions are filed, the date for filing the joint  
17 pretrial order shall be suspended until **30 days after** decision on the dispositive  
18 motions or until further order of the court.

19 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any  
20 objections thereto, shall be included in the joint pretrial order.

21 Extensions or Modifications of the Discovery Plan and Scheduling Order:  
22 Applications to extend any date set by the discovery plan, scheduling order, or other  
23 order must comply with the Local Rules.

24 Protective Order: The parties may seek to enter a stipulated protective order  
25 pursuant to Rule 26(c) prior to producing any confidential documents.  
26

1           Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and  
2 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be  
3 served by sending such documents by email.  
4

5           Alternative Dispute Resolution Certification: The parties certify that they met  
6 and conferred about the possibility of using alternative dispute-resolution processes  
7 including mediation, arbitration, and early neutral evaluation. The parties have not  
8 reached any stipulations at this stage.  
9

10          Alternative Forms of Case Disposition Certification: The parties certify that  
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and  
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).  
13 The parties have not reached any stipulations at this stage.  
14

15          Electronically Stored Information: The parties have discussed the retention  
16 and production of electronic data. The parties agree that service of discovery by  
17 electronic means, including sending original electronic files by email or on a cd is  
18 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.  
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1           Electronic evidence conference certification: The parties further intend to  
2 present evidence in electronic format to jurors for the purposes of jury deliberations  
3 at trial. The parties discussed the presentation of evidence for juror deliberations but  
4 did not reach any stipulations as to the method as this early stage.  
5

6           Dated: June 13, 2023.  
7

8           **FREEDOM LAW FIRM**

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21          *Counsel for Defendant Bank of America,  
N.A.*

22           **ORDER**

23          **IT IS SO ORDERED.**

24             
25           \_\_\_\_\_  
26          UNITED STATES MAGISTRATE JUDGE

27           Dated: June 14, 2023  
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